

KAMER ZUCKER ABBOTT
1 Scott M. Abbott #4500
2 Jen J. Sarafina #9679
Kaitlin H. Ziegler #13625
3 3000 West Charleston Boulevard, Suite 3
Las Vegas, Nevada 89102-1990
4 Tel: (702) 259-8640
Fax: (702) 259-8646
sabbott@kzalaw.com
jsarafina@kzalaw.com
kziegler@kzalaw.com

5
6 Attorneys for Defendant
7 Wynn Las Vegas, LLC

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10
11 KELI P. MAY, SHARON SOUSA, and) Case No. 2:15-cv-02142-RFB-CWH
12 THOMAS BODOVINAC, Individually and on)
behalf of others similarly situated,)
13 Plaintiffs,)
vs.)
14)
15 WYNN LAS VEGAS, LLC, and "JOHN DOES")
CORPORATIONS" 1 to 50, name fictitious,)
actual name and number unknown,)
16 Defendants.)
17)
18 _____)

STIPULATION AND REQUEST TO
EXTEND DEADLINE FOR
DEFENDANT WYNN LAS VEGAS,
LLC'S RESPONSE TO PLAINTIFFS'
MOTION FOR CIRCULATION OF
THE NOTICE OF THE PENDENCY
OF THIS ACTION PURSUANT TO 29
U.S.C. §216(b) AND FOR OTHER
RELIEF

(First Request)

19 The parties, by and through their respective counsel of record, stipulate and request that
20 the Court extend the deadline for Defendant Wynn Las Vegas, LLC's Response to Plaintiffs'
21 Motion for Circulation of Notice of the Pendency of this Action Pursuant to 29 U.S.C. §216(b)
22 and for Other Relief (hereinafter "Motion for Circulation") by an additional one (1) week, up to
23 and including January 15, 2016. In support of this Stipulation and Request, the parties state as
24 follows:

25 1. Plaintiffs filed their Motion for Circulation on December 22, 2015. See Docket
26 No. 9.

1 2. Defendant Wynn Las Vegas, LLC's (hereinafter "Wynn") current deadline to
2 respond to Plaintiffs' Motion for Circulation is January 8, 2016.

3 3. Inasmuch as counsel for Defendant Wynn Las Vegas, LLC (hereinafter "Wynn")
4 were traveling out of state for the holidays including the Christmas and New Years holidays,
5 Wynn's counsel requested and Plaintiffs' counsel agreed to provide Wynn an extension of time
6 to respond to Plaintiffs' Motion for Circulation up to and including January 15, 2016.

7 4. For purposes of this extension only, if the Court grants Wynn the one-week
8 extension requested herein, the parties agree that potential opt-in Plaintiffs will not be
9 prejudiced, such that the time for their consent to join the litigation will be extended by the
10 length of time granted by the extension.

11 5. This request for an extension of time is not sought for any improper purpose or
12 other reason of delay. Rather, it is sought only to provide Wynn with sufficient additional time
13 to prepare its Response to Plaintiffs' Motion for Circulation.

14 6. This is the first request for an extension of time relating to this Motion.

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

1 WHEREFORE, the parties respectfully request that the Court extend the deadline for
2 Defendant to file its Response to Plaintiffs' Motion for Circulation of Notice of the Pendency of
3 this Action Pursuant to 29 U.S.C. §216(b) and for Other Relief, up to and including January 15,
4 2016.

5 Dated December 30, 2015

6 Respectfully submitted,

7 /s/ Dana Sniegocki

8 Christian Gabroy, Esq.
9 GABROY LAW OFFICES
10 170 S. Green Valley Parkway Suite 280
Henderson, Nevada 89012
Tel (702) 259-7777
Fax (702) 259-7704
Fax (702) 385-1827

11 Leon Greenberg, Esq.

12 Dana Sniegocki, Esq.

13 LEON GREENBERG PROFESSIONAL
14 CORPORATION
2965 South Jones Boulevard, Suite E3
15 Las Vegas, Nevada 89146

16 Attorneys for Plaintiffs

Dated December 30, 2015

Respectfully submitted,

7 /s/ Jen J. Sarafina

8 Scott M. Abbott, Esq.
Jen J. Sarafina, Esq.
Kaitlin H. Ziegler, Esq.
9 KAMER ZUCKER ABBOTT
3000 West Charleston Boulevard, Suite 3
Las Vegas, Nevada 89102
Tel: (702) 259-8640
Fax: (702) 259-8646
10 Attorneys for Defendant

11 IT IS SO ORDERED:



12 RICHARD F. BOULWARE, II
13 United States District Judge

14 DATED this 6th day of January, 2016.